

Draft Guidelines on the Food Adulteration (Metallic Contamination) Regulations

**2nd Technical Meeting
31 July 2025**

Guidelines - Update

- To update the Guidelines to “***Guidelines on the Food Adulteration (Metallic Contamination) Regulations***”
 - ***Outdated information will be deleted/amended;***
 - ***More Frequently Asked Questions (FAQs) will be added.***



Draft Guidelines



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Introduction



Purpose

- **“Guidelines on the Food Adulteration (Metallic Contamination) Regulations” (“the Guidelines”)**
 - aims to assist the trade in having a better understanding of the Food Adulteration (Metallic Contamination) Regulations (**Cap. 132V**) as **amended by** the Food Adulteration (Metallic Contamination) (Amendment) Regulation 2025 (**“the Amendment Regulation”**), and
 - to answer some frequently asked questions.



Disclaimer

- **The Guidelines:**

- Should be read in conjunction **with the amended Cap. 132V**, is intended for use as a general reference only
- Does not have the force of the law and should not be interpreted in any manner which would override the provision of the Cap. 132V
- May be amended or supplemented as necessary from time to time



Key features of Cap. 132V (1)

- The Amendment Regulation **updates and establishes** standards for metallic contamination in food:
 - Total number of maximum levels (MLs) increased from 144 to 171
 - 27 new MLs for specified metals (cadmium, lead, and methyl-mercury) in specified food; and
 - 9 updated MLs for lead in existing specified food.
 - A person must not import, consign, deliver, manufacture or sell for human consumption any specified food or compounded food which contains a specified metal in excess of any MLs.



Key features of Cap. 132V (2)

- Principles for application of MLs on food in a dried, dehydrated or concentrated form and on compounded food
- For food / food groups without relevant MLs, the Centre for Food Safety (CFS) will conduct risk assessment to determine whether the food contains the metal concerned in an amount that is dangerous or prejudicial to health



Definitions

- **Key technical terms relevant to the Guidelines as defined in the Cap. 132V, and as appropriate, the Public Health and Municipal Services Ordinance (Cap. 132) (“the Ordinance”) and related subsidiary legislation, have been listed**



Interpretation of ML of Metal in Food in the Schedule



Regulation 3(1)

A person must not import, consign, deliver, manufacture or sell for human consumption any specified food or compounded food which contains a specified metal in excess of the ML.

The ML of each specified metal in each specified food is specified in Part 2 of the Schedule.



Extract of Part 2 of the Schedule

Part 2			
Maximum Level of Metal in Food			
Column 1	Column 2	Column 3	Column 4
Metal	Food	Maximum Level (mg/kg)	Note
1. Antimony	Vegetables	1	
	Cereals	1	
	Meat of animal	1	Note 1
	Meat of poultry	1	Note 1
	Fish	1	Note 2
	Crabs, prawns and shrimps	1	Note 3



How to read Part 2 of the Schedule

- **Column 1 “Metal”** – lists out the metals specified in the Schedule
- **Column 2 “Food”** – lists out the food / food groups to which the ML applies
- **Column 3 “Maximum level”** – lists out the ML (expressed in the unit of “mg/kg”) of each specified metal in each specified food / food group
- **Column 4 “Note ”** – specifies the portion of the food or the form of the food for which the ML applies



A total of 14 notes

Interpretation of specified food in column 2 of Part 2 of the Schedule

- One of the key features of the Cap. 132V is the adoption of Codex Alimentarius Commission (Codex) MLs unless otherwise justified
 - The food descriptions and nomenclatures in the Cap. 132V also make reference to the Codex food classification and product definitions as appropriate
 - Hierarchy of major types of food listed in Part 2 of the Schedule to the Cap. 132V as well as their respective food groups and relevant food items, drawing reference from the Codex food classification, is illustrated in [Annex I](#) of the draft Guidelines
 - Details regarding the Codex food classification and definitions of various food commodities are available at the Codex website



Vegetables



Specified food that has gone through a process of drying, dehydration or concentration (1)

3(2)(b) the maximum level of a specified metal in a specified food that has gone through a process of drying, dehydration or concentration is to be proportionally adjusted according to the change in the concentration of the metal in the food caused by the process.

- For example, dried seafood, dried vegetables (including dried mushrooms), concentrated fruit juice, etc.
- Not applicable to any ML that is already established for specified food in a dried, dehydrated or concentrated form.



Specified food that has gone through a process of drying, dehydration or concentration (2)

- **Water content of the primary food commodity and food in its dried, dehydrated or concentrated form can be derived from:**
 - a) **laboratory test results of water content of a food sample before and after drying, dehydration or concentration; and/or**
 - b) **generally accepted data (e.g. food composition database) regarding the water content of the processed food and its unprocessed counterparts.**



Specified food that has gone through a process of drying, dehydration or concentration (3)

- **Water content of a food sample before and after drying or dehydration may vary with a number of factors including species, seasons, geographical locations, processing requirements, etc.**
 - **Direct laboratory analysis of water content of the food sample before and after processing will provide a better estimate of the “conversion factor”.**
 - **If generally accepted data is used, the trade should ensure that the data sources are accurate and reputable.**



Compounded food

- 3(4) if all ingredients of a compounded food are specified food, the maximum level of a specified metal in the compounded food is the sum of the maximum level of the specified metal in each ingredient multiplied by the proportion, by weight, of the ingredient in the compounded food.**
- Ingredient means any substance which is used in the manufacture or preparation of food and becomes part of the food as finished, even if in altered form, but excludes any additive within the meaning of regulation 2(1) of the Food and Drugs (Composition and Labelling) Regulations (Cap. 132 sub. Leg. W).**



Conducting risk assessment

- **For food / food groups without relevant MLs under the Cap. 132V**
 - **CFS will continue to conduct risk assessment to assess whether the food contains the metal concerned in an amount that is dangerous or prejudicial to health, thereby contravening regulation 3AA of the Cap. 132V**
 - **Section 54 of the Ordinance stipulates that all food for sale in Hong Kong, locally produced or imported, should be fit for human consumption**



Testing or analysis

- **Laboratories are advised to note:**
 - **Portion of the commodity to which the ML applies, i.e.**
 - the ML of a specified metal in each specified food applies to the edible portion of the food; or
 - if applicable, the portion of the food specified in, or the food in the form specified in, a note referred to in column 4 of Part 2 of the Schedule in relation to the food
 - **Where applicable, reference can be made to Codex for guidance on the treatment of fruit or vegetable samples**



Grace period

- During the grace period (i.e. between 5 September 2025 and 5 March 2027 (both dates inclusive), it would be legal for any food item to comply wholly with the requirements of either the regulations under Cap. 132V in force immediately before 5 September 2025 or the Amendment Regulation.
- In any event, all food must comply with the Amendment Regulation starting from 6 March 2027 when the 18-month grace period has ended.



Frequently Asked Questions



Frequently asked questions

- **Chapter 3 of the Guidelines:**
 - **Regulations under Cap. 132V**
 - Definitions, interpretation of MLs, food surveillance and prosecution
 - **Laboratory analysis**



Way forward

- The draft guidelines can be downloaded from the website of CFS:

https://www.cfs.gov.hk/english/whatsnew/whatsnew_fstr/whatsnew_fstr_PA_Food_Adulteration_Metallic_Contamination_2.html

- Please send your comments / suggestion on the draft guidelines on or before 8 Aug 2025
 - Email: ra@fehd.gov.hk
 - Fax: (852) 2803 0534



Thank you

